

EXHIBIT 4

From: [Kristopher Davis](#)
To: *** GDCVerizon-Headwater; [Dominguez, Kate](#); [EXT] [Dacus, Deron](#)
Cc: headwater@raklaw.com; [Chris Bunt](#)
Subject: Headwater v. Verizon (EDTX-352) | Draft DCO, DO, PO
Date: Monday, October 9, 2023 3:55:17 PM
Attachments: [DRAFT DCO \(EDTX-352\).docx](#)
[ATT00001.htm](#)
[DRAFT Protective Order \(EDTX-352\).docx](#)
[ATT00002.htm](#)
[DRAFT Discovery Order \(EDTX-352\).docx](#)
[ATT00003.htm](#)

[WARNING: External Email]

Counsel for Verizon,

Please find attached drafts of the DCO, DO, and PO for this case. The DCO and DO are due Thursday, Oct. 12, and the PO is due next Thursday, Oct. 19. Please provide Verizon's feedback on the drafts.

We also wanted to provide Headwater's feedback on your email copied below. Regarding your request for an additional week extension on Verizon's invalidity/eligibility contention deadlines, the attached draft DCO accepts Verizon's proposal and sets those deadlines for December 14, 2023.

Regarding your request for a stipulated dismissal of Verizon Communications Inc. ("VCI"), Headwater should be amenable provided that, in addition to confirming that the dismissal would not affect the ability of the remaining defendants to satisfy any judgment, Verizon also confirms that: (1) the remaining defendants will not contest venue; and (2) VCI has had no involvement in any allegedly infringing conduct identified in Headwater's complaint and infringement contentions since July 2017. If Verizon agrees, please send a proposed stipulation to that effect for our review.

Regarding your proposal for claim narrowing, we believe it is premature and do not accept Verizon's proposal.